



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

SEP 11 2018

OPP Decision Numbers: 542574  
EPA File Symbol: 53883-ULG  
Petition Number: N/A  
Product Name: CSI PL 1803 Gopher Bait  
EPA Receipt Date: July 5, 2018  
EPA Company Number: 53883  
Company Name: Control Solutions, Inc.

Haley Wade  
Control Solutions, Inc.  
5903 Genoa Red Bluff Road  
Pasadena, TX 77507

Dear Ms. Wade:

The Agency has completed its preliminary technical screening of your application pursuant to Section 33(f)(4)(B)(i)(II) of the Federal Insecticide, Fungicide, and Rodenticide (FIFRA) Act, as amended by the Pesticide Registration Improvement Extension Act. The Agency has determined that your application did not pass the preliminary technical screen and is therefore rejected.


Specifically, acceptable child-resistant packaging (CRP) data are required for this new strychnine end-use product because it has an acute oral LD<sub>50</sub> less than 1.5 g/kg and the product is for residential use. These facts together trigger the requirement for CRP in 40 CFR 157.22. No product-specific CRP data were submitted or cited in support of this PRIA R300 application. This deficiency was communicated to you in a 10-day deficiency letter dated 8/10/18. Your response to the 10-day letter included a schematic of a product container, and a separate schematic of a bottle cap. These data do not address the CRP requirement by documenting that the proposed product container meets the child-resistance standards of 40 CFR 157.32. As a result, the CRP requirement remains deficient.

Any future submissions to the Agency will be considered a new application and subject to the full registration service fee, as well as another initial content screen and preliminary technical screen.

You may be eligible for a partial refund as a result of your application's rejection for failure of its preliminary technical screening. Consult the Agency's Refund Policy at: <http://www.epa.gov/pesticides/fees/fee-reduction-guidance.pdf>. If you believe you are entitled to a refund, submit a refund request to the appropriate PRIA ombudsperson identifying the rejected application by decision number(s) and PRIA category.

If you have questions, please contact Gene Benbow at [Benbow.Gene@epa.gov](mailto:Benbow.Gene@epa.gov) or 703-347-0235.

Sincerely,

A handwritten signature in black ink, reading "Richard P. Keigwin, Jr." with a stylized flourish at the end.

Richard P. Keigwin Jr., Director  
Office of Pesticide Programs  
U.S. Environmental Protection Agency